

**REMARKS**

Claims 12-13 and 24-25 are now pending in the application. By this amendment, Claims 12-13 and 24-25 have been amended, Claims 33-38 have been added, and Claims 1-11, 14-23, and 26-32 have been cancelled without prejudice or disclaimer of the subject matter contained therein. The basis for these amendments and new claims can be found throughout the specification, claims, and drawings originally filed. No new matter has been added. The preceding amendments and the following remarks are believed to be fully responsive to the outstanding Office Action and are believed to place the application in condition for allowance.

The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

**REJECTION UNDER 35 U.S.C. § 102**

Claims 12-13 and 24-25 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Naka et al. (U.S. Pat. No. 5,935,331).

This rejection is respectfully traversed.

Independent Claim 12 calls for a liquid jetting apparatus for jetting a liquid to be applied to a substrate including a first droplet jet head having a first nozzle train positioned at a first angular orientation relative to a radial direction of the substrate, a second droplet jet head having a second nozzle train positioned at a second angular orientation relative to the radial direction of the substrate, and a third droplet jet head having a third nozzle train positioned at a third angular orientation relative to the radial

direction of the substrate. See Specification at pg. 33, Paragraph [0145], pg. 34, Paragraph [0146], and FIGS. 14(a) and 14(b).

Independent Claim 24 calls for a liquid jetting apparatus for jetting a liquid applied to a stationary or rotating substrate including a first droplet jet head having at least one nozzle, a second droplet jet head having at least one nozzle, a third droplet jet head having at least one nozzle, and a spin coater for rotating the substrate. See Specification at pg. 33, Paragraph [0145] and FIGS. 14(a) and 14(b). Furthermore, independent Claim 24 recites that the first droplet jet head is positioned at a first angular orientation relative to a radial direction of the substrate, the second droplet jet head is positioned at a second angular orientation relative to the radial direction of the substrate, and the third droplet jet head is positioned at a third angular orientation relative to the radial direction of the substrate. See Specification at pg. 33, Paragraph [0145], pg. 34, Paragraph [0146], and FIGS. 14(a) and 14(b).

In this manner, the present invention discloses a plurality of droplet jet heads (22) each positioned at a different angular orientation (t1, t2, t3) to a radial direction of a substrate (26). See Specification at pg. 33, Paragraph [0145] and FIGS. 14(a) and 14(b). Furthermore, the present invention discloses that each of the droplet jet heads includes a nozzle train (27) positioned at a different angular orientation (i.e., t1, t2, t3) relative to the radial direction of the substrate. See Specification at pg. 33, Paragraph [0145] and FIGS. 14(a) and 14(b). Naka fails to teach such a relationship.

Naka teaches a plurality of ink jet head configurations (304, 404, 504, 604), each having a different nozzle pattern. See Naka at FIGS. 23, 26, 27, and 28. However, Naka fails to teach or suggest using more than a single ink jet head in conjunction with

a spin coating device for application of ink to a substrate. In this manner, Naka also fails to teach or suggest positioning three ink jet heads at varying angular orientations relative to a radial direction of a substrate. Therefore, Naka fails to teach each and every element of the claimed invention.

Because Naka fails to teach using more than one ink jet head in conjunction with a spin coating device for applying ink to a substrate, and further because Naka fails to teach positioning three ink jet heads at varying angular orientations relative to a radial direction of a substrate, Applicant respectfully submits that Naka fails to teach each and every element of the present invention. Accordingly, Applicant respectfully submits that independent Claims 12 and 24, as well as Claims 13 and 25, respectively dependent therefrom, are in condition for allowance. Therefore, reconsideration and withdrawal of the rejection is respectfully requested.

#### NEW CLAIMS

Independent Claims 12 and 24 are believed to be in condition for allowance in light of the remarks contained above. Because new Claims 33-38 respectively depend from independent Claims 12 and 24, new dependant Claims 33-38 should similarly be in a condition for allowance for at least the same reasons.

#### CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is

believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

Dated: *Feb 10, 2005*

By:

  
G. Gregory Schivley  
Reg. No. 27,382  
Bryant E. Wade  
Reg. No. 40,344

HARNESS, DICKEY & PIERCE, P.L.C.  
P.O. Box 828  
Bloomfield Hills, Michigan 48303  
(248) 641-1600

GGS/BEW/MHS